

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	Bankruptcy No.: 17-24840-CMB
JAMES RIGGS,	)	
	)	Chapter 13
Debtor.	)	
_____	)	Related to Document No. 21
	)	
COUNTY OF ALLEGHENY,	)	Conciliation Conference Date and Time:
	)	August 9, 2018 @ 1:30 p.m.
Movant,	)	
	)	
v.	)	
	)	
JAMES RIGGS,	)	
	)	
Respondent.	)	

**OBJECTIONS OF THE COUNTY OF ALLEGHENY TO CONFIRMATION  
OF DEBTOR'S CHAPTER 13 PLAN DATED JANUARY 15, 2018**

AND NOW comes the County of Allegheny, by and through its counsel, Jeffrey R. Hunt, Esquire and Goehring, Rutter & Boehm, and files the following Objection to Confirmation of Debtor's Chapter 13 Plan dated January 15, 2018, and in support thereof, avers as follows:

1. On December 1, 2017, James Riggs ("Debtor") filed a Chapter 13 bankruptcy case at the above-captioned bankruptcy number.
2. The County of Allegheny ("County") is a creditor in the within bankruptcy case by virtue of delinquent real estate taxes owed by Debtor.
3. Debtor is the owner of the following parcels of real property situate within the County of Allegheny, Commonwealth of Pennsylvania: (a) Block and Lot 465-R-25 (811 Lauck Street), (b) Block and Lot 465-R-299 (2701 F Street), (c) 548-A-206 (205 Oakdale Road), (d) Block and Lot 383-K-195 (1403 Washington Boulevard), and (e) Block and Lot 655-F-107 (3812 Liberty Way) (collectively the "Properties").
4. On February 7, 2018, the County filed Proof of Claim No. 4-1 at the within proceeding for delinquent real estate taxes owed for the Properties for the tax years 2010-2017 in the amount of \$8,951.11, plus statutory interest accruing at the rate of 12% per year on the face amount.
5. Debtor's Plan fails to provide for the full amount of the claim of the County.
6. The County objects to the approval of any Plan that fails to properly provide for its claim.

WHEREFORE, Movant, County of Allegheny, respectfully requests that this Court sustain its Objections and deny confirmation of said Plan, or amend said Plan to include the full amount of its claim.

Dated: June 7, 2018

Respectfully submitted,

GOEHRING, RUTTER & BOEHM

By: /s/ Jeffrey R. Hunt  
Jeffrey R. Hunt, Esquire  
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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a true and correct copy of the foregoing OBJECTIONS OF THE COUNTY OF ALLEGHENY TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN DATED JANUARY 15, 2018 has been served this 7<sup>th</sup> day of June, 2018 by first-class United States mail, postage prepaid, upon:

Paul W. McElrath, Jr., Esquire  
McElrath Legal Holdings, LLC  
1641 Saw Mill Run Boulevard  
Pittsburgh, PA 15210

Ronda J. Winnecour, Esquire  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

Office of the United States Trustee  
Liberty Center  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222

James Riggs  
3812 Liberty Way  
McKeesport, PA 15133

/s/ Jeffrey R. Hunt  
Jeffrey R. Hunt, Esquire